

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CARMEN JOHN PERRI, an individual,  
Plaintiff,

v.

WEDGEWOOD COURT III ASSOCIATES  
LLC, a Washington limited liability  
company,

Defendant.

Case No. 2:19-cv-00110

**STIPULATION AND  
~~PROPOSED~~ ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANT TO RESPOND  
TO COMPLAINT**

**NOTE ON MOTION  
CALENDAR:**

**FEBRUARY 25, 2019**

Plaintiff Carmen John Perri ("Plaintiff") and defendant Wedgewood Court III Associates, LLC ("Defendant"), by and through their undersigned counsel, hereby stipulate to a 30-day extension of the time for Defendant to answer or otherwise respond to the Complaint [Dkt. No. 1] to further facilitate the prospect of settlement discussions.

The Parties hereby submit that good cause exists for extension of the time for Defendant to answer or otherwise respond to the Complaint, as follows.

1. Plaintiff filed the Complaint on January 24, 2019.
2. Defendant received the Summons and Complaint on February 7, 2019.
3. If properly served, Defendant's response to the Complaint is due on February 28, 2019, pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i).

STIPULATION AND [PROPOSED] ORDER TO EXTEND  
DEADLINE TO RESPOND TO COMPLAINT - 1

**GOLDFARB & HUCK  
ROTH RIOJAS, PLLC**  
925 Fourth Avenue, Suite 3950  
Seattle, Washington 98104  
(206) 452-0260

1           4. Plaintiff has made a settlement demand, and, to allow Defendant the opportunity  
2 to consider the settlement demand, the parties have agreed to a 30-day extension of the deadline  
3 for Defendant to respond to the Complaint, to a new deadline of April 1, 2019. The parties agree  
4 that the requested extension would facilitate such discussions, by allowing more time before  
5 Defendant undertakes the expense of preparing a response to the Complaint.  
6

7           RESPECTFULLY SUBMITTED this February 25, 2019

8                               /s/ Kit W. Roth

Kit W. Roth, WSBA No. 33059

9                               /s/ R. Omar Riojas

10                              R. Omar Riojas, WSBA No. 35400

**GOLDFARB & HUCK ROTH RIOJAS, PLLC**

925 Fourth Avenue, Suite 3950

Seattle, Washington 98104

Telephone: (206) 452-0260

Facsimile: (206) 397-3062

E-mail: roth@goldfarb-huck.com

riojas@goldfarb-huck.com

14                              Attorneys for Defendant

15  
16                               /s/ Dan. N. Fiorito

Dan N. Fiorito, WSBA No. 34009

**THE LAW OFFICE OF DAN N. FIORITO III**

844 NW 48<sup>th</sup> St.

Seattle, Washington 98107

PHONE: 206-299-1582

FAX: 206-770-7590

Email: dan@danfiorito.com

21                              Attorney for Plaintiff

**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED.

Dated this 26<sup>th</sup> day of Feb., 2019



James L. Robart  
United States District Court Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2019 I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered parties.

DATED this February 25, 2019.

/s/ Kit W. Roth  
Kit W. Roth, WSBA No. 33059

STIPULATION AND [PROPOSED] ORDER TO EXTEND  
DEADLINE TO RESPOND TO COMPLAINT - 4

**GOLDFARB & HUCK**  
**ROTH RIOJAS, PLLC**  
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